

# EXHIBIT 11



1 MR. FRANK: Take the document down, please.

2 THE COURT: Take the document down.

3 MR. KENDALL: Okay. Take the document down.

4 Q. Does that refresh you as to the size of the class that was  
5 admitted in 2014 with Mr. Wilson?

6 A. No.

7 Q. Okay. Mr. Wilson's suggested GPA was 3.87. Would you  
8 agree with me that's high for a water polo walk-on?

9 A. I don't know off the top of my head.

10:53 10 Q. Well, you've been doing SUBCO admissions for how many  
11 years?

12 A. Many.

13 Q. How many?

14 A. Probably 14 or 15.

15 Q. And in your -- based upon your 14 or 15 years experience  
16 reviewing SUBCO applicants for water polo candidates, would you  
17 agree with me that 3.87 is a pretty high grade point average  
18 for a water polo candidate?

19 A. I wouldn't be able to speak to a specific sport, but yes.

10:53 20 3.87 would be a strong GPA among our student athletes. It's  
21 not a very competitive GPA among our overall applicant pool and  
22 our students that we admit.

23 Q. But for student athletes, put him up in maybe the top  
24 20 percent or so for GPA's, rough numbers?

25 A. I just haven't looked at those data.

1 Q. Okay. And if they had a 29 on the ACT, would you agree  
2 with me that would be a high score as well for water polo  
3 walk-on candidates, correct?

4 A. Among all student athletes, that would appear to be a  
5 stronger score, but, again, among our overall applicant pool,  
6 it's not --

7 Q. I'm asking you about the athletes. Please limit your  
8 answer to my question.

9 My question was for water polo walk-on candidates. A  
10:54 10 29 is a high -- is a relatively high ACT score, correct? Yes  
11 or no?

12 A. I can't answer that question.

13 Q. So after 15 years of looking at water polo walk-on files,  
14 you have no memory of what's a good score or a not so good  
15 score on the ACT for a water polo candidate?

16 A. You asked me specifically about water polo walk-ons, and  
17 that's very specific. I don't feel comfortable, you know,  
18 asserting something that I can't be sure of. I haven't  
19 reviewed those data specifically.

10:55 20 Q. Okay. So for general athletic walk-ons, is 29 a pretty  
21 good score?

22 A. I think it's fine. I think we see, you know, again,  
23 students with above and below that among our recruited  
24 walk-ons.

25 Q. But that's certainly in the top half, isn't it?

1 Q. And if Mr. Brunold -- Mr. Brunold never told you these  
2 kids don't have any talent, we're just bringing them in for the  
3 money.

4 A. No.

5 Q. He never said that to you?

6 A. No.

7 Q. So if that was going on, it was hidden from you, correct?

8 A. I had no knowledge of that.

9 Q. I had a different question.

11:46 10 If that was going on, it was hidden from you, correct?

11 MR. FRANK: Your Honor, I object. She had no  
12 knowledge.

13 THE COURT: Sustained.

14 BY MR. KENDALL:

15 Q. If that was going on, then you would not include  
16 Mr. Brunold when you said, "We do not take donations for  
17 admissions."

18 MR. FRANK: Objection to the hypothetical.

19 THE COURT: He can ask that question.

11:46 20 A. The work of the SUBCO was to consider students for  
21 athletic talent alone.

22 Q. That's your opinion.

23 MR. FRANK: Objection.

24 THE COURT: Sustained.

25 BY MR. KENDALL:

1 Q. Do you have a written rule that says that?

2 A. No, that is the expectations that all of the members of  
3 the office of admission have around what happens at SUBCO.

4 Q. Well, when you say that's the expectation of all the  
5 admissions officers, was there a vote taken of the admissions  
6 officers and what their expectations were?

7 A. There were --

8 Q. Just a yes or no, was there a vote?

9 A. There was not a vote.

11:47 10 Q. Is there a written rule that everybody was given and said  
11 this is compliance department, sign it, this is how you're  
12 going to do your job, you can never consider donations as part  
13 of a SUBCO admissions?

14 A. There is not a written rule.

15 Q. Okay. You agree with me this whole sort of college  
16 admissions scandal has been a tremendous embarrassment to USC,  
17 correct?

18 A. I was very unhappy to learn about it.

19 Q. I'm not asking your opinion. It's an embarrassment to all  
11:47 20 of USC, correct?

21 A. Yes, I think that's fair to say.

22 Q. And you'd agree with me the last thing the USC admissions  
23 department wants the world to think is that it was willing to  
24 sell slots to people for money, correct?

25 A. The admission office was not willing to do that.

1 C E R T I F I C A T E  
2  
34 UNITED STATES DISTRICT COURT )  
5 DISTRICT OF MASSACHUSETTS )  
6  
78 We, Kristin M. Kelley and Debra Joyce, certify that  
9 the foregoing is a correct transcript from the record of  
10 proceedings taken September 21, 2021 in the above-entitled  
11 matter to the best of our skill and ability.  
12  
1314 /s/ Kristin M. KelleySeptember 21, 202115 /s/ Debra JoyceSeptember 21, 202116 Kristin M. Kelley, RPR, CRR  
17 Debra Joyce, RMR, CRR  
18 Official Court Reporter  
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Date